

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

SECOND SUPPLEMENTAL DECLARATION OF EDGAR W. MOSLEY II

I, Edgar W. Mosley II, hereby declare under penalty of perjury as follows:

1. I supervise the team at Alvarez & Marsal North America LLC (“A&M”) that works as proposed financial advisor to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”).

2. Except as otherwise indicated, all facts set forth in this declaration (the “Declaration”) are based on my personal knowledge, information obtained from the Debtors and their advisors, including the A&M team working under my supervision, my review of relevant documents and information concerning the Debtors’ operations, financial affairs or restructuring initiatives or my opinions based on my experience and knowledge. If called as a witness, I would testify competently to the statements set forth in this Declaration.

3. Attached as Exhibit 1 is a consolidated cash projection for the Debtors for the thirteen-week period beginning January 14, 2023 as well as a separate cash projection over the same period for each of the four primary groups of Debtors identified to me by the Chief Executive Officer of the Debtors.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

4. Attached as Exhibit 2 is an updated summary of cash balances in the name of the Debtors and Non-Debtors with banking and other financial institutions that the Debtors have been able to substantiate as of the date of this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 10, 2023

/s/ Edgar W. Mosley II
Name: Edgar W. Mosley II
Alvarez & Marsal North America, LLC
Title: Senior Managing Director

Exhibit 1

Dated: January 10, 2023

| WRS SILO | | | | | | | | | | | | | | | | |
|-------------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------------|----|------|
| (\$ in millions) | | | | | | | | | | | | | | | | |
| Forecast Week: | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 13-Week Total | | |
| Week Ending Date: | 1/20/23 | 1/27/23 | 2/03/23 | 2/10/23 | 2/17/23 | 2/24/23 | 3/03/23 | 3/10/23 | 3/17/23 | 3/24/23 | 3/31/23 | 4/07/23 | 4/14/23 | | | |
| DISBURSEMENTS | | | | | | | | | | | | | | | | |
| Payroll & Benefits | \$ | (1) | \$ | (0) | \$ | (1) | \$ | (0) | \$ | (1) | \$ | (0) | \$ | (1) | \$ | (6) |
| Critical Vendor Payments | | - | | - | | (0) | | - | | - | | - | | - | | (0) |
| Other Operating Disbursements | | (0) | | (0) | | (2) | | (0) | | (2) | | (0) | | (0) | | (9) |
| Total Disbursements | \$ | (1) | \$ | (1) | \$ | (2) | \$ | (1) | \$ | (1) | \$ | (1) | \$ | (2) | \$ | (15) |
| Intercompany Funding | | 0 | | 0 | | 0 | | 0 | | 0 | | 0 | | 0 | | 3 |
| Net Cash Flow | \$ | (1) | \$ | (0) | \$ | (2) | \$ | (0) | \$ | (2) | \$ | (0) | \$ | (2) | \$ | (12) |
| UNRESTRICTED CASH | | | | | | | | | | | | | | | | |
| Beginning Unrestricted Cash | \$ | 102 | \$ | 101 | \$ | 101 | \$ | 99 | \$ | 98 | \$ | 97 | \$ | 95 | \$ | 102 |
| (+/-) Net Cash Flow | | (1) | | (0) | | (2) | | (0) | | (2) | | (0) | | (2) | | (12) |
| Ending Unrestricted Cash | \$ | 101 | \$ | 101 | \$ | 99 | \$ | 98 | \$ | 97 | \$ | 97 | \$ | 95 | \$ | 90 |
| Intercompany Receivable / (Payable) | \$ | 133 | \$ | 133 | \$ | 132 | \$ | 132 | \$ | 132 | \$ | 131 | \$ | 131 | \$ | 130 |

13-Week Cash Flow Forecast

Dated: January 10, 2023

| | | | | | | | | | | | | | | | | |
|-------------------------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|---------------|----------------|--|
| DOTCOM SILO | | | | | | | | | | | | | | | | |
| (\$ in millions) | | | | | | | | | | | | | | | | |
| Forecast Week: | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | | | |
| Week Ending Date: | 1/20/23 | 1/27/23 | 2/03/23 | 2/10/23 | 2/17/23 | 2/24/23 | 3/03/23 | 3/10/23 | 3/17/23 | 3/24/23 | 3/31/23 | 4/07/23 | 4/14/23 | | | |
| DISBURSEMENTS | | | | | | | | | | | | | | | | |
| Payroll & Benefits | \$ (0) | \$ (1) | \$ (0) | \$ - | \$ (0) | \$ - | \$ (1) | \$ - | \$ (0) | \$ - | \$ (1) | \$ - | \$ (0) | \$ (0) | \$ (5) | |
| Critical Vendor Payments | - | (0) | - | (0) | - | - | - | (0) | - | - | - | (0) | (0) | (0) | (0) | |
| Other Operating Disbursements | (0) | (1) | (1) | (1) | (0) | (7) | (1) | (1) | (0) | (2) | (1) | (1) | (0) | (0) | (16) | |
| Total Disbursements | \$ (1) | \$ (2) | \$ (2) | \$ (1) | \$ (1) | \$ (7) | \$ (2) | \$ (1) | \$ (1) | \$ (2) | \$ (2) | \$ (1) | \$ (0) | \$ (0) | \$ (21) | |
| Intercompany Funding | 0 | 0 | 2 | 1 | 0 | 6 | 1 | 0 | 0 | 2 | 1 | 0 | 0 | 0 | 16 | |
| Net Cash Flow | \$ (0) | \$ (1) | \$ 0 | \$ 0 | \$ (0) | \$ (0) | \$ (1) | \$ (0) | \$ (0) | \$ (0) | \$ (1) | \$ (0) | \$ (0) | \$ (0) | \$ (5) | |
| UNRESTRICTED CASH | | | | | | | | | | | | | | | | |
| Beginning Unrestricted Cash | \$ 136 | \$ 136 | \$ 134 | \$ 134 | \$ 134 | \$ 134 | \$ 134 | \$ 133 | \$ 133 | \$ 133 | \$ 132 | \$ 132 | \$ 131 | \$ 136 | | |
| (+/-) Net Cash Flow | (0) | (1) | 0 | 0 | (0) | (0) | (1) | (0) | (0) | (0) | (1) | (0) | (0) | (5) | | |
| Ending Unrestricted Cash | \$ 136 | \$ 134 | \$ 134 | \$ 134 | \$ 134 | \$ 134 | \$ 133 | \$ 133 | \$ 133 | \$ 132 | \$ 132 | \$ 131 | \$ 131 | \$ 131 | | |
| Intercompany Receivable / (Payable) | \$ (3) | \$ (4) | \$ (6) | \$ (6) | \$ (7) | \$ (13) | \$ (15) | \$ (15) | \$ (16) | \$ (17) | \$ (19) | \$ (19) | \$ (19) | \$ (19) | | |

| | | | | | | | | | | | | | | | | |
|-------------------------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|--|--|
| ALAMEDA SILO | | | | | | | | | | | | | | | | |
| (\$ in millions) | | | | | | | | | | | | | | | | |
| Forecast Week: | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | | | |
| Week Ending Date: | 1/20/23 | 1/27/23 | 2/03/23 | 2/10/23 | 2/17/23 | 2/24/23 | 3/03/23 | 3/10/23 | 3/17/23 | 3/24/23 | 3/31/23 | 4/07/23 | 4/14/23 | | | |
| DISBURSEMENTS | | | | | | | | | | | | | | | | |
| Payroll & Benefits | \$ (1) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (1) | \$ (0) | \$ (0) | \$ (0) | \$ (1) | \$ (0) | \$ (0) | \$ (3) | | |
| Critical Vendor Payments | - | - | - | - | - | - | - | - | - | - | - | - | - | - | | |
| Other Operating Disbursements | (0) | (0) | (2) | (0) | (0) | (2) | (2) | (0) | (0) | (1) | (2) | (0) | (0) | (9) | | |
| Total Disbursements | \$ (1) | \$ (0) | \$ (2) | \$ (0) | \$ (0) | \$ (2) | \$ (3) | \$ (0) | \$ (0) | \$ (1) | \$ (3) | \$ (0) | \$ (0) | \$ (12) | | |
| Intercompany Funding | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | | |
| Net Cash Flow | \$ (0) | \$ (0) | \$ (2) | \$ (0) | \$ (0) | \$ (2) | \$ (3) | \$ (0) | \$ (0) | \$ (1) | \$ (3) | \$ (0) | \$ (0) | \$ (11) | | |
| UNRESTRICTED CASH | | | | | | | | | | | | | | | | |
| Beginning Unrestricted Cash | \$ 423 | \$ 423 | \$ 423 | \$ 421 | \$ 421 | \$ 420 | \$ 419 | \$ 416 | \$ 416 | \$ 416 | \$ 415 | \$ 412 | \$ 412 | \$ 423 | | |
| (+/-) Net Cash Flow | (0) | (0) | (2) | (0) | (0) | (2) | (3) | (0) | (0) | (1) | (3) | (0) | (0) | (11) | | |
| Ending Unrestricted Cash | \$ 423 | \$ 423 | \$ 421 | \$ 421 | \$ 420 | \$ 419 | \$ 416 | \$ 416 | \$ 416 | \$ 415 | \$ 412 | \$ 412 | \$ 412 | \$ 412 | | |
| Intercompany Receivable / (Payable) | \$ 400 | \$ 400 | \$ 399 | \$ 399 | \$ 399 | \$ 399 | \$ 399 | \$ 399 | \$ 399 | \$ 399 | \$ 399 | \$ 399 | \$ 398 | \$ 398 | | |

13-Week Cash Flow Forecast

Dated: January 10, 2023

VENTURES SILO

(\$ in millions)

| Forecast Week: Week Ending Date: | 1 1/20/23 | 2 1/27/23 | 3 2/03/23 | 4 2/10/23 | 5 2/17/23 | 6 2/24/23 | 7 3/03/23 | 8 3/10/23 | 9 3/17/23 | 10 3/24/23 | 11 3/31/23 | 12 4/07/23 | 13 4/14/23 | 13-Week Total |
|--------------------------------------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|------------------|
| DISBURSEMENTS | | | | | | | | | | | | | | |
| Payroll & Benefits | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Critical Vendor Payments | (0) | (0) | (0) | - | - | - | - | - | - | - | - | - | - | (0) |
| Other Operating Disbursements | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (1) |
| Total Disbursements | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (1) |
| Intercompany Funding | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Net Cash Flow | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (0) | \$ (1) |
| UNRESTRICTED CASH | | | | | | | | | | | | | | |
| Beginning Unrestricted Cash ⁽¹⁾ | \$ 9 | \$ 9 | \$ 9 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 9 |
| (+/-) Net Cash Flow | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (1) |
| Ending Unrestricted Cash | \$ 9 | \$ 9 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 | \$ 8 |

MASTER

(\$ in millions)

| Forecast Week: Week Ending Date: | 1 1/20/23 | 2 1/27/23 | 3 2/03/23 | 4 2/10/23 | 5 2/17/23 | 6 2/24/23 | 7 3/03/23 | 8 3/10/23 | 9 3/17/23 | 10 3/24/23 | 11 3/31/23 | 12 4/07/23 | 13 4/14/23 | 13-Week Total |
|---------------------------------------|---------------|----------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|------------------|
| DISBURSEMENTS | | | | | | | | | | | | | | |
| Payroll & Benefits | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Critical Vendor Payments | - | (3) | - | - | (3) | - | (3) | - | - | (2) | - | - | - | (10) |
| Other Operating Disbursements | (0) | (27) | - | (0) | - | (15) | - | (0) | - | (14) | - | (0) | - | (56) |
| Restructuring Professional & UST Fees | - | (0) | - | - | - | (20) | - | - | - | (28) | - | - | - | (48) |
| Total Disbursements | \$ (0) | \$ (30) | \$ - | \$ (0) | \$ (3) | \$ (35) | \$ (3) | \$ (0) | \$ - | \$ (44) | \$ - | \$ (0) | \$ - | \$ (114) |
| Non-Debtor Funding | (1) | - | - | - | (0) | - | - | - | (0) | - | - | - | - | (1) |
| Intercompany Funding | (1) | (1) | (2) | (1) | (1) | (7) | (2) | (1) | (1) | (2) | (2) | (1) | (1) | (20) |
| Net Cash Flow | \$ (1) | \$ (30) | \$ (2) | \$ (1) | \$ (3) | \$ (42) | \$ (4) | \$ (1) | \$ (1) | \$ (46) | \$ (2) | \$ (1) | \$ (1) | \$ (135) |
| UNRESTRICTED CASH | | | | | | | | | | | | | | |
| Beginning Unrestricted Cash | \$ 519 | \$ 518 | \$ 488 | \$ 486 | \$ 485 | \$ 481 | \$ 439 | \$ 435 | \$ 434 | \$ 434 | \$ 388 | \$ 386 | \$ 385 | \$ 519 |
| (+/-) Net Cash Flow | (1) | (30) | (2) | (1) | (3) | (42) | (4) | (1) | (1) | (46) | (2) | (1) | (1) | (135) |
| Ending Unrestricted Cash | \$ 518 | \$ 488 | \$ 486 | \$ 485 | \$ 481 | \$ 439 | \$ 435 | \$ 434 | \$ 434 | \$ 388 | \$ 386 | \$ 385 | \$ 385 | \$ 385 |
| Intercompany Receivable / (Payable) | \$ (529) | \$ (528) | \$ (526) | \$ (525) | \$ (524) | \$ (518) | \$ (516) | \$ (515) | \$ (514) | \$ (513) | \$ (511) | \$ (510) | \$ (509) | \$ (509) |

Exhibit 2

Cash Summary - Detail

Dated: January 10, 2023

(USD in 000's)

Account Balances as of December 30, 2022

| | Filing Type | Unrestricted Cash | Custodial Cash | Other Restricted Cash | Total Cash |
|--------------------------------------------------------|-------------|---------------------|-------------------|-----------------------|---------------------|
| Alameda Silo | | | | | |
| Alameda Research Ltd | Debtor | \$ 359,071 | \$ 27,574 | \$ - | \$ 386,646 |
| Maclaurin Investments Ltd. | Debtor | 2,752 | 1,121 | - | 3,873 |
| Ledger Prime LLC | Debtor | 2,231 | - | - | 2,231 |
| North Dimension Inc | Debtor | 801 | - | - | 801 |
| Alameda Research LLC | Debtor | 759 | 2 | - | 761 |
| Alameda Research KK | Debtor | 96 | - | - | 96 |
| LedgerPrime Digital Asset Opportunities Fund, LLC | Debtor | (0) | - | 524 | 524 |
| LedgerPrime Digital Asset Opportunities Master Fund LP | Debtor | 100 | - | 630 | 730 |
| Cottonwood Grove Ltd | Debtor | - | - | - | - |
| Goodman Investments Ltd. | Debtor | - | - | - | - |
| Hive Empire Trading Pty Ltd | Debtor | (1) | - | - | (1) |
| Alameda Silo Account | Debtor | 459,418 | - | - | 459,418 |
| Alameda Debtor Accounts | | \$ 825,226 | \$ 28,697 | \$ 1,155 | \$ 855,078 |
| Dotcom Silo | | | | | |
| FTX Japan K.K. | Debtor | \$ 120,137 | \$ 52,790 | \$ - | \$ 172,927 |
| FTX EU Ltd (K-DNA Financial Services Ltd) | Debtor | 1,251 | 48,157 | - | 49,407 |
| Quoine Pte Ltd | Debtor | 2,585 | 8,478 | - | 11,063 |
| FTX Exchange FZE | Debtor | 1,505 | - | 4,000 | 5,505 |
| FTX Trading Ltd | Debtor | 376 | 18,758 | - | 19,134 |
| FTX TURKEY TEKNOLOJİ VE TİCARET ANONİM ŞİRKET | Debtor | 37 | 3,070 | - | 3,106 |
| FTX Europe AG | Debtor | 2,597 | - | - | 2,597 |
| Blockfolio, Inc. | Debtor | 2,417 | - | - | 2,417 |
| Crypto Bahamas LLC | Debtor | 900 | - | - | 900 |
| FTX Japan Services KK | Debtor | 763 | - | - | 763 |
| Quoine Vietnam Co. Ltd | Debtor | 490 | - | - | 490 |
| FTX Japan Holdings K.K. | Debtor | 495 | - | - | 495 |
| FTX Digital Holdings (Singapore) Pte Ltd | Debtor | 254 | - | - | 254 |
| FTX Trading GmbH | Debtor | 146 | - | - | 146 |
| Liquid Securities Singapore Pte Ltd | Debtor | - | - | - | - |
| FTX Switzerland GmbH | Debtor | 17 | - | - | 17 |
| Quoine India Pte Ltd | Debtor | 3,183 | - | - | 3,183 |
| FTX Crypto Services Ltd. | Debtor | 288 | - | - | 288 |
| Innovatia Ltd | Debtor | - | - | - | - |
| Zubr Exchange Ltd | Debtor | - | - | - | - |
| Dotcom Silo Account | Debtor | 517 | - | - | 517 |
| Dotcom Debtor Accounts | | \$ 137,957 | \$ 131,253 | \$ 4,000 | \$ 273,210 |
| Ventures Silo | | | | | |
| Paper Bird Inc | Debtor | \$ 7,907 | \$ - | \$ - | \$ 7,907 |
| Clifton Bay Investments Ltd | Debtor | 145 | - | - | 145 |
| FTX Ventures Ltd | Debtor | 780 | - | - | 780 |
| Island Bay Ventures Inc | Debtor | - | - | - | - |
| Ventures Silo Account | Debtor | - | - | - | - |
| Ventures Debtor Accounts | | \$ 8,831 | \$ - | \$ - | \$ 8,831 |
| WRS Silo | | | | | |
| West Realm Shires Services Inc. | Debtor | \$ 7,325 | \$ 29,446 | \$ 1,271 | \$ 38,042 |
| West Realm Shires Inc. | Debtor | 35,412 | - | - | 35,412 |
| West Realm Shires Financial Services Inc. | Debtor | 226 | - | - | 226 |
| FTX Lend Inc. | Debtor | 485 | - | - | 485 |
| Ledger Holdings Inc. | Debtor | 98 | - | - | 98 |
| Digital Custody Inc. | Debtor | 982 | - | - | 982 |
| Hawaii Digital Assets Inc. | Debtor | 20 | - | - | 20 |
| FTX Digital Assets LLC | Debtor | 500 | - | - | 500 |
| Good Luck Games, LLC | Debtor | 8 | - | - | 8 |
| Master Silo Account | Debtor | 5,534 | - | - | 5,534 |
| WRS Silo Account | Debtor | 184,000 | - | - | 184,000 |
| WRS Debtor Accounts | | \$ 234,589 | \$ 29,446 | \$ 1,271 | \$ 265,306 |
| Total Debtor Entities | | \$ 1,206,604 | \$ 189,396 | \$ 6,425 | \$ 1,402,426 |
| Alameda Silo | | | | | |
| Alameda Non-Debtor Accounts | | - | - | - | - |
| Dotcom Silo | | | | | |
| FTX Digital Markets Ltd | Non-Debtor | \$ 617 | \$ 92,572 | \$ 60,000 | \$ 153,189 |
| FTX Philanthropy Inc | Non-Debtor | 10,877 | - | - | 10,877 |
| FTX Australia Pty Ltd | Non-Debtor | - | - | - | - |
| FTX Express Pty Ltd | Non-Debtor | - | - | - | - |
| Humble Libretto LLC | Non-Debtor | - | - | - | - |
| FTX Foundation Inc | Non-Debtor | - | - | - | - |
| Dotcom Non-Debtor Accounts | | \$ 11,495 | \$ 92,572 | \$ 60,000 | \$ 164,066 |
| WRS Silo | | | | | |
| Embed Clearing LLC. | Non-Debtor | \$ - | \$ - | \$ 30,479 | \$ 30,479 |
| Embed Financial Technologies Inc | Non-Debtor | 395 | - | - | 395 |
| LedgerX LLC | Non-Debtor | 13,644 | 24,103 | 90,603 | 128,350 |
| FTX Vault Trust Company | Non-Debtor | - | - | 3,531 | 3,531 |
| FTX Capital Markets LLC | Non-Debtor | - | - | - | - |
| Dotcom Non-Debtor Accounts | | \$ 14,040 | \$ 24,103 | \$ 124,613 | \$ 162,756 |
| Total Non-Debtor Entities | | \$ 25,534 | \$ 116,675 | \$ 184,612 | \$ 326,822 |
| Grand Total | | \$ 1,232,139 | \$ 306,071 | \$ 191,038 | \$ 1,729,248 |